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July 28, 2022

Via ECF

Hon. Gregory H. Woods, USDJ
United States District Court
Southern District of New York
500 Pearl Street, Room 2260
New York, NY 10007

Family First Funding LLC v. Sprout Mortgage Asset Trust
1:22-cv-4406-GHW

Dear Judge Woods:

This firm was recently retained to represent defendant Sprout Mortgage Asset Trust ("SMAT") in the above-captioned matter, replacing prior counsel. During the time that prior counsel was representing defendant, the parties had consented in June 2022 to extend SMAT's time to answer, move, or otherwise respond to the Complaint from July 8, 2022 to July 29, 2022. For reasons not known to the undersigned, no application for the extension was made.

On July 26, 2022, plaintiff filed an amended complaint, pursuant to the parties' Stipulation (Dkt. # 12).

In light of the undersigned's recent retention, the newly-amended complaint, and with the consent of plaintiff's counsel pursuant to the parties' Stipulation (Dkt. # 12), we respectfully request that defendant's time to answer, move or respond to the Amended Complaint be extended to September 9, 2022.

We further respectfully request, with the consent of plaintiff's counsel, that the dates of this Court's Initial Pretrial Conference Order dated June 1, 2022 -- for submission of a proposed case management plan on August 9, 2022 and for initial conference on August 16, 2022 -- be accordingly adjourned by such amount of time as this Court finds appropriate.

Thank you for your attention to this matter.

Respectfully submitted,

/s/

Forchelli Deegan Terrana LLP
By: Nathan R. Jones

Encl.